

1 STEPHANIE M. HINDS (CABN 154284)  
2 Acting United States Attorney

3 HALLIE HOFFMAN (CABN 210020)  
4 Chief, Criminal Division

5 ANDREW F. DAWSON (CABN 264421)  
6 LLOYD FARNHAM (CABN 202231)  
7 Assistant United States Attorneys

8 450 Golden Gate Avenue, Box 36055  
9 San Francisco, California 94102-3495  
10 Telephone: (415) 436-7200  
11 FAX: (415) 436-7234  
12 adawson@usdoj.gov

13 Attorneys for United States of America

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,

18 Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

) CASE NO. 20-CR-00249 RS

) STIPULATION AND ORDER  
19 CONTINUING STATUS CONFERENCE  
20 AS MODIFIED BY THE COURT

21 This matter is currently set for a status conference on March 9, 2021, at 2:30pm. Since this  
22 Court ruled on defendant's Motion to Compel via an Order entered on January 26, 2021, the government  
23 has continued to produce discovery. The government's most recent production was sent to the defense  
24 on February 1, 2021. The defense team is currently reviewing those materials. The government is  
currently processing and preparing its next production of documents.

25 The discovery in the case is voluminous, and the parties request an approximate 60-day  
26 continuance in order to provide the defense with the opportunity to continue to review these discovery  
27 materials, and for the government to continue producing documents. The parties also request that the  
28 Court exclude time from the Speedy Trial Act deadlines on the basis that the proposed continuance will

1 allow for the effective preparation of counsel. The parties agree that the ends of justice served by this  
2 continuance outweigh the best interest of the public and the defendant in a speedy trial. The parties  
3 further agree that the failure to grant this continuance would unreasonably deny counsel for defendant  
4 the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.  
5 Accordingly, the parties agree that the period from March 9, 2021 through May 11, 2021, or the date of  
6 the continued Status Conference, should be excluded in accordance with the provisions of the Speedy  
7 Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking  
8 into account the exercise of due diligence.

9 IT IS SO STIPULATED.

10 DATED: March 3, 2021

Respectfully submitted,

11 STEPHANIE M. HINDS  
12 Acting United States Attorney

13 /s/  
14 ANDREW F. DAWSON  
15 Assistant United States Attorney

16 ZUBER LAWLER & DEL DUCA LLP

17 /s/  
18 BRIAN J. BECK  
19 Attorney for Defendant

20 **ORDER**

21 For the reasons stated in the stipulation of the parties above, and for good cause shown, the  
22 Court hereby orders that the Status Conference currently set for March 9, 2021 is vacated and reset for  
23 May 11, 2021, at 2:30 p.m. It is further ordered that time is excluded, pursuant to 18 U.S.C. §§ 3161(h)  
(7)(A) and (B)(iv) through May 11, 2021.

24 DATED: March 4, 2021

25   
26 HONORABLE RICHARD SEEBORG  
27 Chief United States District Judge